

RICHARD W. EPSTEIN (FLA. BAR NO: 229091)

(Admitted Pro Hac Vice)

Richard.Epstein@gmlaw.com

REBECCA F. BRATTER (FLA. BAR NO: 0685100)

(Admitted Pro Hac Vice)

Rebecca.Bratter@gmlaw.com

GREENSPOON MARDER, P.A.

200 East Broward Blvd., Suite 1500

Ft. Lauderdale, FL 33301

954-491-1120

954-343-6958(facsimile)

ROBERT S. BOULTER (SBN 153549)

rsb@lb-attorneys.com

PETER C. LAGARIAS (SBN 77091)

rsb@lb-attorneys.com

LAGARIAS & BOULTER, LLP

1629 Fifth Avenue

San Rafael, California 94901-1828

Telephone: (415) 460-0100

Facsimile: (415) 460-1099

Attorneys for Defendants

Global Client Solutions, LLC and

Rocky Mountain Bank and Trust

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

HEATHER NEWTON, individually and
behalf of others similarly situated,

PLAINTIFF,

v.

AMERICAN DEBT SERVICES, INC., a
California corporation; QUALITY SUPPORT
SERVICES, LLC, a California limited liability
company; GLOBAL CLIENT SOLUTIONS,
LLC; ROCKY MOUNTAIN BANK AND
TRUST; and DOES 1-100,

Defendants.

) Case No: 3:11-cv-03228-EMC

)

) CLASS ACTION

)

) **PROPOSED ORDER ON STIPULATION**

)

) **DEFENDANT GLOBAL CLIENT**

)

) **SOLUTIONS, LLC & ROCKEY**

)

) **MOUNTAIN BANK & TRUST AND**

)

) **PLAINTIFF HEATHER NEWTON'S**

)

) **STIPULATION TO EXTEND**

)

) **DEFENDANTS' DEADLINE TO FILE A**

)

) **REPLY ON THE MOTION TO STAY**

)

)

)

1 THIS CAUSE having come before the Court on Defendants Rocky Mountain Bank &
2 Trust ("RMBT"), Global Client Solutions, LLC ("Global"), (collectively, "Defendants") and
3 Plaintiff Heather Newton ("Plaintiff") (all, "Parties") Stipulation to Extend Defendants' deadline
4 to file their Reply to Plaintiff's Memorandum in Opposition to the Motion to Stay (the
5 "Response"), it is now thereupon,

6 PURSUANT TO STIPULATION, IT IS SO ORDERED:

- 7 1. The Parties' Stipulation is GRANTED.
- 8 2. Global and RMBT's reply(s) to Plaintiff's Response shall be due on June 7, 2012.

9 DONE AND ORDERED in Chambers, at San Francisco, California, on this
10 6th day of June, 2012.

